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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CHARLIE YOUNG,
Plaintiff,
vs.
KILOLO KIJAKAZI,
Acting Commissioner of Social Security,
Defendant.

Case No.: 2:22-cv-00420-VCF

**UNOPPOSED MOTION FOR EXTENSION OF
TIME**

(FIRST REQUEST)

1 Defendant, the Acting Commissioner of Social Security, through the undersigned counsel, hereby
2 requests a 30-day extension of time to respond to Plaintiff's Motion for Reversal and/or Remand, which is
3 currently due on or before August 8, 2022. The new proposed deadline is September 7, 2022.

4 This is Defendant's first request for an extension of time. Good cause exists for this extension
5 due to workload of the undersigned attorney. Since Plaintiff's motion was filed, the undersigned attorney
6 has worked on more than 30 cases at various stages of litigation, including numerous responsive briefs
7 that were or are due before August 8. Defendant's counsel will endeavor to complete these tasks as soon
8 as possible. This request is made in good faith and with no intention to unduly delay the proceedings,
9 and counsel apologizes for any inconvenience.

10 On July 29, 2022, the undersigned conferred with Plaintiff's counsel, who has no opposition to the
11 requested extension.

12 It is therefore respectfully requested that Defendant be granted a 30-day extension of time to file a
13 response to Plaintiff's Motion for Reversal and/or Remand, through and including September 7, 2022.

14
15 Dated: August 1, 2022

16 JASON M. FRIERSON
United States Attorney

17 /s/ Allison J. Cheung
18 ALLISON J. CHEUNG
Special Assistant United States Attorney

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21 IT IS SO ORDERED:

22 
23 UNITED STATES MAGISTRATE JUDGE

24 DATED: 8-2-2022
25
26

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Marc Kalagian
marc.kalagian@rksslaw.com
Attorney for Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 1, 2022

/s/ Allison J. Cheung
ALLISON J. CHEUNG
Special Assistant United States Attorney